

**NEW SOURCE CONSTRUCTION PERMIT
and MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY**

**Delivery Concepts, Incorporated
29301 West Mishawaka Road
Elkhart, Indiana 46517**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-14380-00557	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 27, 2001

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates stationary a new source that will manufacture fiberglass mini truck bodies.

Authorized Individual: Anthony Marchetti
Source Address: 29301 West Mishawaka Road Elkhart, Indiana 46517
Mailing Address: 58356 County Road 3 South, Elkhart, Indiana 46517
Phone Number: (219) 294-4050
SIC Code: 3089
County Location: Elkhart
County Status: Attainment for all criteria pollutants
Source Status: Initial Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emissions units and Pollution Control Equipment Summary

This stationary fiberglass mini truck bodies manufacturing source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Two (2) natural gas-fired heating units, identified as HSG200 and HSG400, with a total heat input capacity of 400,000 Btu per hour (Btu/hr);
- (b) One (1) fiberglass chop operation with a maximum capacity of 26.22 gallons per part, utilizing FIT Flocoat, a non-atomized application system; with dry filters to control PM overspray emissions, exhausting to stack SV001;
- (c) One (1) polyester resin and gelcoat operations, with a maximum capacity of 7.06 gallons per part, utilizing FIT Flocoat, a non-atomized application system; with dry filters to control PM overspray emissions, exhausting to stack SV001; and
- (d) One (1) final finish area, rated at 1 gallon of coating per week using brush for primer application and touch-up guns for the fiberglass finish, exhausting to stack SV002.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because: (Choose one or more applicable criteria).

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If the Affidavit of Construction does not verify that the facilities covered in this Construction Permit were constructed as proposed in the application, then the Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section prior to beginning operation of the facilities.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).
- (e) Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii) and 326 IAC 2-5.1-4, the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of volatile organic compounds (VOC) is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by

326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate

sections of this permit shall not require revocation of this permit.

- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking

further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

Record Keeping and Reporting Requirements

C.13 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.14 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-

Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;

- (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or

- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

C.17 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

- (a) Two (2) natural gas-fired heating units, identified as HSG200 and HSG400, with a total heat input capacity of 400,000 Btu per hour (Btu/hr);
- (b) One (1) fiberglass chop operation with a maximum capacity of 26.22 gallons per part, utilizing FIT Flocoat, a non-atomized application system; with dry filters to control PM overspray emissions, exhausting to stack SV001;
- (c) One (1) polyester resin and gelcoat operations, with a maximum capacity of 7.06 gallons per part, utilizing FIT Flocoat, a non-atomized application system; with dry filters to control PM overspray emissions, exhausting to stack SV001; and
- (d) One (1) final finish area, rated at 1 gallon of coating per week using brush for primer application and touch-up guns for the fiberglass finish, exhausting to stack SV002.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the mini truck fiberglass lay-up is subject to the requirements of 326 IAC, 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Pursuant to this rule, the resins and gelcoats usage shall be limited to restrict the VOC emissions from the mini truck fiberglass lay-up to 66.5 tons per consecutive month period, rolled on a monthly basis.

During the first twelve (12) months of operation, the resins and gelcoats usage shall be limited such that the total volatile organic emissions divided by the accumulated months of operation shall not exceed 66.5 total tons per year divided by twelve (12) months, which equals 5.5 tons per month. Compliance with this limit and the requirements of 326 IAC 2-4.1-1 (MACT) has been determined to satisfy the requirements of BACT.

D.1.2 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the mini truck fiberglass lay-up shall be the following:

- (a) The resins and gelcoats usage shall be limited such that the volatile organic HAP emissions from resins and gel coats only shall be limited to 66.5 tons per consecutive month period, rolled on a monthly basis.

During the first twelve (12) months of operation, the resins and gelcoats usage shall be limited such that the total volatile organic HAP divided by the accumulated months of operation shall not exceed 66.5 total tons per year divided by twelve (12) months, which equals 5.5 tons per month.

- (1) Monthly usage by weight, weight percent monomer content that is HAP, method of application, and other emission reduction techniques for each gel coat and resin shall be recorded. Volatile organic HAP emissions shall be calculated by

multiplying the usage of each gel coat and resin by the emission factor that is appropriate for the monomer content, method of application, and other emission reduction techniques for each gel coat and resin, and summing the emissions for all gel coats and resins. Emission factors shall be obtained from the reference approved by IDEM, OAQ.

- (2) Until such time that new emissions information is made available by U.S. EPA in its AP-42 document or other U.S. EPA-approved form, emission factors shall be taken from the following reference approved by IDEM, OAQ: "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999, with the exception of the emission factors for controlled spray application. For operations not addressed by this reference, emission factors shall be taken from U.S. EPA's AP-42 document. For the purposes of these emission calculations, HAP monomer in resins and gel coats that is not styrene or methyl methacrylate shall be considered as styrene on an equivalent weight basis.
- (b) The resins and gelcoats usage shall be limited to the following maximum HAP monomer contents:
 - (1) The source shall utilize resin with a maximum styrene content of 35%.
 - (2) The source shall utilize gelcoats with a maximum styrene content of 37%.
 - (3) The fiberglass chop, polyester resin and gelcoat operations shall apply materials using nonatomized mechanical application equipment only.
 - (i) Flows from the applicator, shall be in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified in this condition is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ. The HAP monomer content limits for resins and gel coats within each category, shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category
 E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
 Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
*Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer*

- (c) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in the following Condition D.1.3 shall be followed.

D.1.3 Styrene [326 IAC 20-25]

The following shall apply to the fiberglass mini truck open molding process:

- (a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
- (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.
 - (5) Clean-up rags with solvent shall be stored in closed containers.
 - (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
 - (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times

except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

- (b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
- (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

- (c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
 - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.

- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
- (d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:
 - (1) Name and address of the owner or operator.
 - (2) Address of the physical location.
 - (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM emissions from the fiberglass operation shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the VOC and HAP limit specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.8 Particulate Matter (PM)

- (a) The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the fiberglass lay-up is in operation.

- (b) Delivery Concepts, Incorporated shall implement an operator-training program.
 - (1) All operators that perform gel coat spray operations, resin spray operation, chopping operations or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing and new operators shall be trained according to the schedule in Condition D.1.3(b).
 - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators, and training records shall be maintained on site or available within one hour for inspection by IDEM.
 - (3) All operators shall be given refresher training annually.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) To document compliance with Condition b(1) through b(3), Delivery Concepts, Incorporated shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage, volatile organic HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1 and D.1.2.
 - (1) The amount and VOC/HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC/HAP usage for each month;
 - (4) The weight of VOCs/HAPs emitted for each compliance period; and
 - (5) Training records.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with VOC emissions limit in Conditions D.1.1 and HAP emission limits in D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Delivery Concepts, Incorporated
Address:	29301 West Mishawaka Road
City:	Elkhart
Phone #:	(219) 522-3423
MSOP #:	039-14380-00557

I hereby certify that **Delivery Concepts, Incorporated** is ☒ still in operation.
☐ no longer in operation.
I hereby certify that **Delivery Concepts, Incorporated** is ☒ in compliance with the requirements of **MSOP 039-14380-00557**.
☐ not in compliance with the requirements of **MSOP 039-14380-00557**.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Quarterly Report

Source Name: Delivery Concepts, Incorporated
Source Address: 29301 West Mishawaka Road, Elkhart, Indiana 46517
Mailing Address: 58356 County Road 3 South, Elkhart, Indiana 46517
MSOP No.: 039-14380-00557
Facility: Fiberglass Operation
Parameter: VOC and HAP
Limit:

Gelcoat Content: 37%

Styrene Content: 35%

VOC: The resins and gelcoats usage shall be limited in order to limit the VOC and HAP emissions from the mini truck fiberglass lay-up operation to 66.5 tons per consecutive month period, rolled on a monthly basis.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC/HAP Usage This Month	VOC/HAP Usage Previous 11 Months	VOC/HAP Usage 12 Month Total
Month 1			
Month 2			
Month 3			

Note: This report form shall accompany a detailed report showing the % styrene and % gelcoat used, including the material usage and mini truck produced for each reporting period.

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name: Delivery Concepts Incorporated
 Source Location: 29301 West Mishawaka Road, Elkhart, Indiana 46517
 County: Elkhart
 SIC Code: 3089
 Operation Permit No.: 039-14380-00557
 Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed an application from Delivery Concepts Incorporated relating to the construction and operation of a new source that will manufacture fiberglass mini truck bodies, which will include the following natural gas equipment and fiberglass open molding operations:

- (a) Two (2) natural gas-fired heating units, identified as HSG200 and HSG400, with a total heat input capacity of 400,000 Btu per hour (Btu/hr);
- (b) One (1) fiberglass chop operation with a maximum capacity of 26.22 gallons per part, utilizing FIT Flocoat, a non-atomized application system; with dry filters to control PM overspray emissions, exhausting to stack SV001;
- (c) One (1) polyester resin and gelcoat operations, with a maximum capacity of 7.06 gallons per part, utilizing FIT Flocoat, a non-atomized application system; with dry filters to control PM overspray emissions, exhausting to stack SV001; and
- (d) One (1) final finish area, rated at 1 gallon of coating per week using brush for primer application and touch-up guns for the fiberglass finish, exhausting to stack SV002.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV001	Chop and Gelcoat operations	25	1.67	8,600	ambient
SV002	Final Finish	25	1.67	8,600	ambient

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 11, 2001, and additional information received via e-mail on May 17, 2001. A MACT/BACT analysis was requested by OAQ on May 23, 2001, and it was submitted by the source via e-mail on June 19, 2001.

Emission Calculations

- (a) Natural Gas Combustion Emissions: See Page 2 of 2 TSD Appendix A for detailed emission calculations.
- (b) Fiberglass Open Molding Operations: Also, see Page 1 of 2 TSD Appendix A for HAPs detailed emission calculations.

Material	Throughput (gal/unit)	Production (Units/Hour)	Density (lb/gal)	Weight % Styrene Manomer	Emission Factor (% Flash Off)	Percent Transfer Efficiency	PM/PM10 Emissions (tons/year)	Styrene/VOC Emissions (tons/year)
Resin	26.22	0.25	9.00	35%	3.6	98.5%	2.52	9.29
Gelcoat	7.06	1.0	9.86	37%	18.8%	80%	38.42	57.32
TOTAL							40.9	66.59

Methodology:

Styrene/VOC Emissions = gal/unit * units/hr * lb/gal * Flash Off Factor * 8760 hrs/yr * ton/2000 lb

PM Emissions = gal/unit * units/hr * lb/gal * (1- wt % VOC/Styrene) * (1- Transfer Efficiency) * 8760 hrs/yr * tons/2000 lb

SUMMARY OF EMISSIONS (TONS/YEAR)					
Pollutant	Natural Gas Combustion	Fiberglass Operation		TOTAL Uncontrolled Emissions	TOTAL Controlled Emissions
		Uncontrolled	Controlled		
PM	0.01	40.90	0.82	40.91	0.83
PM10	0.03	40.90	0.82	40.93	0.85
SO2	0.00	0.00	0.00	0.00	0.00
NOx	0.53	0.00	0.00	0.53	0.53
VOC	0.03	66.59	66.59	66.62	66.62
CO	0.44	0.00	0.00	0.44	0.44
Styrene	0.00	66.59	66.59	66.59	66.59
Toluene	0.00	0.06	0.06	0.06	0.06
Formaldehyde	0.00	0.01	0.01	0.01	0.01
MEK	0.00	0.14	0.14	0.14	0.14
Dimethyl Phthalate	0.00	2.81	2.81	2.81	2.81

Note: Dry filters control efficiency - 98%

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	40.91
PM-10	40.94
SO ₂	0.00
VOC	66.62
CO	0.44
NO _x	0.53

HAP's	Potential To Emit (tons/year)
Styrene	66.59
Toluene	0.06
MEK	0.14
Dimethyl Phthalate	2.81
Formaldehyde	0.01
TOTAL	69.61

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of styrene, a single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of the combined HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. Initially, the source will be issued a New Source Construction Permit and Minor Source Operating Permit (MSOP).
- (b) After 12 months from the postmarked submission date of the Affidavit of Construction, the source is required to submit either a Part 70 permit application or a FESOP application.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Natural Gas Combustion	0.01	0.03	0.00	0.03	0.44	0.53	0.00
Fiberglass Operations	0.82	0.82	0.00	66.59	0.00	0.00	69.61
Total Emissions	0.83	0.85	0.00	66.62	0.44	0.53	69.61

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	maintenance
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Elkhart County has been classified as attainment or unclassifiable for all the other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Emissions (ton/yr)
PM	0.83
PM10	0.85
SO ₂	0.00
VOC	66.62
CO	0.44
NO _x	0.53
Single HAP	66.59
Combination HAPs	69.61

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year, or
(c) any combination of HAPs is greater than or equal to 25 tons/year.

This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

- (a) 326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Elkhart County and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).
- (b) 326 IAC 5-1 (Visible Emissions Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

- (a) 326 IAC 6-3: PM allowable emissions:
This rule mandates a PM allowable emissions for the fiberglass open molding operation, using the following equation.

For process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

For process weight rate in excess of sixty thousand (60,000) pounds per hour:

$$E = 55.0 P^{0.11} - 40$$

Where: E = Allowable PM emissions in lb/hr

P = Process weight in ton/hr

The source will be in compliance with this rule using dry filters to control the PM overspray.

- (b) 326 IAC 6-2 (PM Emissions -Indirect Heating Sources)
This rule is not applicable for the two (2) natural gas-fired heating units, identified as HSG200 and HSG400, because they are not sources of indirect heating.
- (c) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to new facilities as of November 1, 1980, with potential VOC emissions

at levels of 25 tons per year or greater.

The new fiberglass lay-up operation is subject to this rule since its potential VOC emission is greater than 25 tons per year. The source has submitted a BACT/MACT analysis (See MACT determination for the detailed analysis).

BACT Conclusion

1. Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the fiberglass mini truck manufacturing operation is subject to the requirements of 326 IAC 8-1-6, which requires that the Best Available Control Technology (BACT) be used to control VOC emissions. Pursuant to this rule, the operating conditions for the fiberglass mini truck manufacturing operation shall be the following:

- (a) The source shall utilize resin with a maximum styrene content of 35%.
- (b) The source shall utilize gelcoats with a maximum styrene content of 37%.
- (c) The fiberglass chop, polyester resin and gelcoat operations shall apply materials using nonatomized mechanical application equipment only.
 - (1) Flows from the applicator, shall be in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices.

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified in this condition is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified and/or additional emission reduction techniques approved by IDEM, OAQ. The HAP monomer content limits for resins and gel coats within each category, shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

M_R = Total monthly mass of material within each category
 E_a = Emission factor for each material based on allowable monomer content and allowable application method for each category.
 Em_A = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
Units: mass = tons
emission factor = lbs of monomer per ton of resin or gel coat
emissions = lbs of monomer

- (d) The work practice, cleaning, and training standards required pursuant to 326 IAC 20-25 as specified in the following Condition shall be followed.

2. Styrene [326 IAC 20-25]

The following shall apply to the reinforced plastic composites open molding process:

- (a) Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:
 - (1) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (2) Except for mixing containers as described in item (7), HAP containing materials shall be kept in a closed container when not in use.
 - (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (4) Solvent collection containers shall be kept closed when not in use.
 - (5) Clean-up rags with solvent shall be stored in closed containers.
 - (6) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.
 - (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (b) Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
 - (1) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (1) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training

shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

The owner or operator shall maintain the following training records on site and available for inspection and review:

- (1) A copy of the current training program.
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

(c) Pursuant to 326 IAC 20-25-3(d), on or after January 1, 2002 the following cleaning operations for resin and gel coat application equipment shall apply:

- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
- (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

(d) Pursuant to 326 IAC 20-25-7(b), on or before March 1, 2002, the owner or operator of a source subject to 326 IAC 20-25 shall submit an initial statement of compliance to the commissioner. The initial statement of compliance shall include all of the following:

- (1) Name and address of the owner or operator.
- (2) Address of the physical location.
- (3) Statement signed by a responsible official, as set forth in 326 IAC 2-7-1(34), certifying that the source achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the source is in compliance with all the requirements of this rule.

(d) 326 IAC 2-4.1-1 (New Source Toxics Control)

This rule applies to new construction or reconstruction of a major source of hazardous air pollutants (HAP) after July 27, 1997, including permits pending with the department on the effective date of this rule, shall comply with the requirements under this rule.

The new fiberglass lay-up operation is subject to this rule since it is a major source for hazardous air pollutant, emitting single HAP at 10 tons per year or more; or emitting total HAPs at 25 tons per year or more.

MACT

The source has submitted the following MACT analysis which evaluated current technologies in an attempt to go beyond what is established as the presumptive MACT for New Fiberglass Reinforced Plastics Sources:

The MACT review is required under Section 112G of Title III of the 1990 Clean Air Act Amendments (CAAA). Title III established a comprehensive program for the reduction of hazardous air pollutants (HAPs). The basic approach of Title III, is to identify source categories that emit significant amounts of HAPs and establish technology based standards for their control. The standards of control are to be based on the highest level of control achieved by a similar source for new sources (112g), and control equal to the top 12% of existing similar sources (112d). Section 112g requires that new or modified major sources of HAPs are to determine on a case by case basis, a level of control that is equivalent to the best controlled similar sources.

It was expected that US EPA would have a database and guidance to assist the states and permittees in determining what the "maximum degree of reduction" of HAPs would be for any given source. The EPA has not yet issued guidance nor compiled a comprehensive database to assist permittees and states in their MACT determinations. Delivery Concepts, Inc. used the following to determine highest level of control at similar sources:

- Contacted coating suppliers regarding current coating technology available and what technologies are currently in use at other Composites manufacturers.
- Reviewed state regulations to identify control standards in effect for reinforced plastic composites.
- Reviewed reports issued by EPA regarding the 112d development groups.
- Contacted Keith Barrett USEPA Reinforced Plastics Composites MACT representative
- Reviewed various states permits for fiberglass facilities
- Examined the RBLC (RACT, BACT, LAER Clearinghouse databases to identify required control measures for similar sources; clearinghouse review included USEPA site.)

****Note****

None of the data available specifically addresses hazardous air pollutants (HAPs). All the emission data and regulations reviewed primarily address volatile organic compounds (VOCs). The MACT analysis relies on the fact that the HAP's being controlled are also VOCs.

Description of Process

Delivery Concepts manufacturing and assembly process incorporates insignificant amounts of grinding, trimming, and finishing fiberglass mini truck bodies. The activities will be designed in accordance with the new Indiana Rule 326 IAC 20-25-1. The main emission activity at Delivery Concepts will be the non-atomized spray application of polyester resins and gelcoats in an open molding process. This is the primary source of HAP and VOC emissions.

Usage Rates

Material usage rates in this analysis are based on a maximum production. The maximum production for resin application is 2 units a day and 8 units a day may be gelcoated. The maximum actual production will be based on a total of these eight units. Emissions from these products escape through ventilation exhaust.

Similar Sources

In performing the MACT analysis, it was necessary to establish specific criteria that

could be used to distinguish between similar and dissimilar sources. By working with our coating and equipment suppliers, the following criteria were established to distinguish similar sources:

- Styrene Contents of Resins
- Vacuum Bag Technology
- Non-Atomized Spray Equipment
- Gel booth dimensions and air flow (extremely low VOC concentration rates)
- Application techniques
- Styrene Content of Gelcoats
- Production volumes
- Aesthetic requirements
- Non-automobile or light duty truck
- Other regulating vehicle standards (i.e.; Motor Vehicle Stds. NFPA Stds etc.)

In assessing what constitutes a similar source, it cannot be emphasized enough the tremendous differences between the processes used to manufacture small mini bodies compared to standard production shops that have multi-lines, conveyor systems, filled resin capabilities.

Suppliers were contacted to see what coating technologies are utilized by various manufactures nationwide. The Styrene Content of the resin is standard within the industry. Prior to the recent testing conducted by EPA and CFA, resin contents could be a range from 60 percent to 42 percent. Most companies have switched to the use of lower styrene content resins with maximum contents of 35 percent unless using a filled system or specialty resin. Most companies are using lower styrene content gel coats as well. This ranges in the specific cosmetic requirements, durability of the specific product and application process.

Coating Suppliers

In an effort to determine what coating technologies are available and compatible with Delivery Concepts' requirements, resin and gelcoat suppliers and a few similar like sources were contacted to determine what coatings on the market are currently being used in similar like processes. Some of the suppliers contacted were Cook Composites, Superior Fiberglass and Resins, Lilly Gelcoats (Valspar Corporation), and the CMTI Clean Manufacturing Technology Institute and CFA Composite Fabricators Association was contacted to compare products available on the market.

All contacts stated that low styrene gelcoats and resins are available, however, products that are used for motor homes, may vary in contents compared to products used in the boating or bath ware industry.

Vapor suppressed resins were found to be available and recommended in the USEPA MACT Model. The use of vapor suppressants is an effective styrene emissions reduction technique. However, vapor suppressants cannot be used in all applications due to poor secondary bonding problems. Suppressants form a film, which inhibits styrene evaporation, on the surface of a curing laminate. This film may decrease adhesion of subsequent laminates, causing the structural integrity of the laminate to be compromised. The mini bodies produced at Delivery Concepts are used in food product delivery. Many trucks must have built in ovens or coolers to maintain proper food temperature. In critical applications such as this, tanks, or other load bearing structures, a laminate bond failure could lead to a catastrophic failure of the structure. Vapor suppressants are not an option for emission reduction in this process for this reason. Vapor suppressants cannot be used with gelcoat applications.

Controlled spray and Non-atomized application equipment were another methods reviewed. This method increases transfer efficiency in atomized spray applications. Testing conducted by EPA and CFA showed that Atomized spray application contributes

to increased surface area. Spray fan patterns and off-mold spray contribute to the increase in higher levels of emissions. The goal of controlled spraying is to minimize surface area by reducing atomization and over spray. Delivery Concepts has invested in non-atomizing mechanical application equipment. Many companies reviewed in this search are unable due to processing techniques and product design to use flow application techniques for gelcoat application. Delivery Concepts will however be using non-atomized spray application equipment for both Resin and Gelcoat processes.

Vacuum Bagging and closed mold curing was not an option looked at for Delivery Concepts application. Parts are very contoured and small. A vacuum could not be attained because of the detailed design of these small mini truck body parts.

Production levels, customer requirements, and labor intense systems allow these facilities to accommodate the limitations of the lower styrene content technology. For this reason, this technology was considered acceptable in determining MACT for Delivery Concept's new facility.

The VOC levels specified in the proposed MACT determination for Delivery Concepts, Inc. new facility reflect the state of the art in coating formulations. There are no sources utilizing lower emission coatings in a similar process than those that are proposed.

Reinforced Plastics Regulations

An Internet search was conducted of various state web sites looking for fiberglass rules. You will note the search of the state regulations showed that many states have existing regulations controlling HAP's and VOC's, many have surface coating limitations related to painting operations, however no other state has finalized specific regulations for the reinforced composites industry except for the state of Indiana Office of Air Quality. The permit application for Delivery Concepts new facility currently meets all the requirements of the Indiana Rule 326 IAC 20-25-1.

Non-Atomized Spray application, Lower styrene containing resins and gelcoats, operator training, standard work practices will be accepted as forms of emission reduction technology for this MACT determination.

EPA MACT Development Groups

The USEPA Office of Compliance has identified a number of industry specific sources and is in the process of characterizing these sources as to their HAPs emissions. The purpose of this effort is to develop national emission standards for hazardous air pollutants (NESHAPS), as required by Congress under the Clean Air Act Amendments of 1990. EPA is dividing the different sources into primary process groups and product specific subgroups; this process is in the very early stages and allot of description and subgroup delineation is not currently developed. The primary sources of data used in the MACT floor are: site visits, state air permits, and toxic release inventory systems. The information compiled included the amounts and types of resins used, the resin HAP contents, application methods, final products, standard work practices, and the presence of add-on controls. A review of the current process groups, indicate that one of the groups would be applicable to Delivery Concept's operations. The Major regulation is the Reinforced Plastics Composites MACT for open molding sources. The current MACT Floor Options Table breaks open mold processes up. Spray lay-up, manual application, gelcoat processing would be the ones applicable to Delivery Concepts.

The State of Indiana used this information for determining their presumptive MACT rule. In addition, the applicable emission reduction techniques discussed in the CFA emission and unified emission factor and control technology was also included. Work practice standards were adopted from the Woodworking NESHAP found in Subpart JJ.

State Permit Reviews

Because MACT is such a new standard and no specific limits exist, an effort has been made to search permits issued for similar sources. Several permits reviewed contained no specific composites HAP or VOC limitations and the permits did not specify specific application processes. It is noted that California requires lower VOC/HAP products be used, North Carolina has issued some permits with fiberglass operations and have followed the technologies listed in the CFA unified emission factor report. There were three states that issued orders requiring the use of add-on control technology. A comparison of these facilities, shows that operations are very different. All the facilities with add-on controls were sources of large emissions. They were not single shift or labor intensive facility, and they were not customized production facilities.

RBLC (RACT, BACT, LAER Clearinghouse)

Although the BACT/LAER clearinghouses were established for BACT analysis purposes, they provide some information about some more recent sources and the emission limitations applied. A review of the USEPA RBLC web site identified a number of fiberglass sources. Several of the sources listed were located in the state of Indiana. Others were listed in the state of Ohio, Washington, Oregon, North Carolina, and Eastern Coastal States. The control technologies found in the clearinghouse searches are consistent with what was presented as control in the Delivery Concept's BACT analysis, (Indiana State Rule 326 IAC 20-25-1). End of pipe controls were not considered an option in the BACT because of economic feasibility. Add on controls are the only alternative above the MACT floor levels that can be universally applied to all facilities. The control technology basis for deriving above the floor control efficiency however contains flaws related to the amount of VOC and HAP that can be removed in small sources effectively. The Small Business Association and SBRFA have intervened determining that the use of add-on controls for businesses defined as small is an unnecessary burden. EPA has since revised its MACT floor tables to reflect issues recommended by that committee.

Summary and Conclusions

The control technologies evaluated in this MACT analysis identified low VOC/HAP coatings and higher transfer efficiency non-atomized spray equipment as the current technologies utilized by similar sources in our industry. Therefore, these material/equipment standards constitute the MACT floor. Below we identify the MACT levels and equipment requirements for each process.

Although additional VOC/HAP reductions beyond those already obtained by Delivery Concepts can be anticipated in the future, the application methods being proposed in this report, represent the best available from the standpoint of environmental impact and product acceptability. Further modification to achieve additional VOC/HAP reductions could impair product quality and acceptability in a highly competitive market. Additional reductions based upon technologies that are not yet proven to work for similar production processes, would cause significant financial impacts.

Based on the analysis performed, the MACT (maximum achievable control technology) for specific processes is described below.

Delivery Concepts will adopt Indiana Rule 326 IAC 20-25-1 as compliance with MACT determinations. The use of 35% or lower styrene content resins, the use of 37% or less styrene content gelcoats, non-atomized mechanical application equipment, work practice standards, and operator training shall meet the emission reductions required in the proposed MACT Floor document for Small Businesses as defined by the United States Government.

Therefore, the MACT operation conditions for Delivery Concepts, Incorporated shall be

the following:

1. New Source Toxics Control [326 IAC 2-4.1-1]

- (a) The source shall utilized resin with a maximum styrene content of 35%.
- (b) The source shall utilized gelcoats with a maximum styrene content of 37%.
- (c) The fiberglass chop, polyester resin and gelcoat operations shall apply materials using nonatomized mechanical application equipment only.
- (d) The following work practices shall apply to the reinforced plastic composites open molding process :
 - (1) Cleaning operations for resin and gel coat application equipment:
 - (A) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment. To the extent possible the cleaning solvent used shall also be a non-VOC solvent.
 - (B) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
 - (C) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.
 - (2) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
 - (3) Except for mixing containers as described in item (8), HAP and VOC containing materials shall be kept in a closed container when not in use.
 - (4) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
 - (5) Solvent collection containers shall be kept closed when not in use.
 - (6) Clean-up rags with solvent shall be stored in closed containers.
 - (7) Closed containers shall be used for the storage of the following:
 - (A) All production and tooling resins that contain HAPs.
 - (B) All production and tooling gel coats that contain HAPs.
 - (C) Waste resins and gel coats that contain HAPs.
 - (D) Cleaning materials, including waste cleaning materials.
 - (E) Other materials that contain HAPs.

- (8) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.
- (f) All new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:
 - (1) All personnel hired after the effective date of this rule shall be trained within fifteen (15) days of hiring.
 - (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule.
 - (3) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
 - (4) Personnel who have been trained by another owner or operator subject to this rule are exempt from subdivision (2) if written documentation that the employee's training is current is provided to the new employer.
 - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:

- (1) Appropriate application techniques.
- (2) Appropriate equipment cleaning procedures.
- (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

Conclusion

The construction and operation of this fiberglass mini truck bodies manufacturing plant shall be subject to the conditions of the attached **New Source Construction and Minor Source Operating Permit 039-14380-00557**.

Appendix A: Emission Calculations
HAP Emission Calculations

Page 1 of 2 TSD AppA

Company Name: Delivery Concepts, Inc.
Address City IN Zip: 29301 W. Mishawaka Rd., Elkhart, IN 46517
MSOP: 039-14380-00557
Permit Reviewer: Aida De Guzman
Date Application Received: May 11, 2001

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % MEK	Weight % Dimethyl Phthalate	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	MEK Emissions (ton/yr)	Dimethyl Phthalate (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Catalyst Norox 9	9.15	0.140000	1.00	0.00%	0.00%	0.00%	2.00%	50.00%	0.00%	0.00%	0.00	0.00	0.00	0.11	2.81	0.00	0.00
TR 301 Sealer	8.75	0.062200	0.13	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.01	0.00	0.00	0.00	0.00
TR 210 Release	7.2	0.015000	0.13	0.00%	70.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00	0.04	0.00	0.02	0.00	0.00	0.00
TR 905 Prep	7.05	0.007800	0.13	0.00%	70.00%	0.00%	30.00%	0.00%	0.00%	0.00%	0.00	0.02	0.00	0.01	0.00	0.00	0.00
TR 910 Sealer	7.3	0.023000	0.13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
TR 900 Release	7.3	0.023000	0.13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total State Potential Emissions											0.00	0.06	0.01	0.14	2.81	0.00	0.00
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METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 2 of 2 TSD App A

Company Name: Delivery Concepts, Inc.
Address City IN Zip: 29301 W. Mishawaka Rd., Elkhart, IN 46517
MSOP: 039-14380-00557

2 Heating Units:
 GSG200 - 0.4 mmBtu/hr & **Date Application Received:** May 11, 20001
 GSD400 - 0.4 mmBtu/hr
 1 air make-up unit @ 0.4 mmBtu/hr

Reviewer: Aida de Guzman

Heat Input Capacity Potential Throughput
 MMBtu/hr MMCF/yr

1.2

10.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.01	0.04	0.00	0.53	0.03	0.44

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).